



GILBERT | MCWHERTER | SCOTT | BOBBITT PLC

200 W. Martin Luther King Blvd, 10th Floor, Suite 1067
Chattanooga, TN 37402 | 423.499.3044 (T)

February 7, 2019

Luther Wright, Jr.
Casey M. Parker
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
401 Commerce St., Suite 1200
Nashville, TN 37219-2446

Re: *Singh v. Vanderbilt University Medical Center and Vanderbilt University*

Dear Counsel:

Please find enclosed a CD containing Plaintiff's document production, which is composed of three recordings and documents bates stamped 000001-461. This accompanies Plaintiff's discovery responses, which were previously served on November 15, 2018.

Now that the Protective Order has been entered, please let me know at your earliest convenience when you anticipate serving responses to Plaintiff's discovery requests to Defendants, which were served to you on December 7, 2018.

Should you have any questions or concerns, please do not hesitate to contact me.

Yours very truly,

GILBERT McWHERTER
SCOTT BOBBITT PLC

Caraline E. Rickard

Enclosures – CD

NASHVILLE OFFICE: 341 Cool Springs Boulevard, Suite 230 | Franklin, TN 37067 | 615.354.1144 (T)

MEMPHIS OFFICE: 6000 Poplar Ave, Suite 250 | Memphis, TN 38119 | 901.766.1868 (T)

JACKSON OFFICE: 101 N. Highland Ave | Jackson, TN 38301 | 731.664.1340 (T)



GILBERT | MCWHERTER | SCOTT | BOBBITT PLC

341 Cool Springs Boulevard, Suite 230 | Franklin, TN 37067
615.354.1144 (T)

February 20, 2019

Luther Wright, Jr.
Casey M. Parker
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
401 Commerce St., Suite 1200
Nashville, TN 37219-2446

Via U.S. Mail and E-mail

Re: *Singh v. Vanderbilt University Medical Center and Vanderbilt University*

Dear Counsel:

First, Plaintiff has not received Defendants' responses to Plaintiff's First Set of Interrogatories and Requests for Production of Documents, which was served via e-mail on December 7, 2018. While we initially excused delayed responses due to the need for a Protective Order, that Order was entered by the Court on January 24, 2019. If Plaintiff does not receive Defendants' discovery responses by February 27, 2019, we will be forced to file a motion to compel.

Second, please find enclosed Notices of Deposition for Dr. Wayman, Dr. Sternberg, and Dr. Bruce regarding this matter. These have been tentatively set for March 13-14 at your office. If you need to change the dates or location, I am happy to discuss alternatives.

If you have any questions or wish to discuss this further, please do not hesitate to contact me or Caraline.

Yours very truly,

GILBERT McWHERTER
SCOTT BOBBITT PLC

Justin S. Gilbert

Enclosures

Caraline Rickard

From: Wright, Jr. Luther <luther.wright@ogletree.com>
Sent: Thursday, February 21, 2019 4:34 PM
To: Justin Gilbert; Caraline Rickard; Jhoselin Revolorio
Cc: Rachael Cook; Parker, Casey McCluskey
Subject: RE: Singh v. Vanderbilt

All,

Thanks for the e-mail. Would one of you be available for a quick call tomorrow? My schedule is horrendous during the next several weeks and I would like to propose some dates the last two weeks of March as possibilities for depositions. I obviously need to depose the Plaintiff and former counsel Tracey Kinslow (which is one of the issues I want to talk to you about briefly as it relates to the privilege issue and the limited waiver recognized in the Court's Order. I believe the communications between plaintiff and counsel relevant to the prior motion are discoverable and should be produced). I think we can do the depositions by agreement past March 15th if you are willing, or I can move to extend the deadline and perhaps extend the SJ deadlines by one week for filing and response and shorten the reply deadline.

I plan to have the discovery responses to you on or before the date specified. Would also like to discuss your thoughts on a resolution before depositions.

Luther Wright, Jr. | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

SunTrust Plaza, 401 Commerce Street, Suite 1200 | Nashville, TN 37219-2446 | Telephone: 615-687-2213 | Fax: 615-254-1908

luther.wright@ogletree.com | www.ogletree.com | [Bio](#)

From: Rachael Cook <rcook@gilbertfirm.com>
Sent: Wednesday, February 20, 2019 1:14 PM
To: Wright, Jr. Luther <Luther.Wright@ogletreedeakins.com>; Parker, Casey McCluskey <casey.parker@ogletreedeakins.com>
Cc: Justin Gilbert <jgilbert@gilbertfirm.com>; Caraline Rickard <crickard@gilbertfirm.com>; Jhoselin Revolorio <jrevolorio@gilbertfirm.com>
Subject: Singh v. Vanderbilt

Dear Counsel,

Please find the attached correspondence from Mr. Gilbert regarding the above-referenced matter.

Thanks,



GILBERT | MCWHERTER
SCOTT | BOBBITT PLC

Rachael Cook
Legal Assistant

54 Exeter Road, Suite D | Jackson, TN 38305
731.664.1340 | rcook@gilbertfirm.com
www.gilbertfirm.com

Jackson | Nashville | Chattanooga | Memphis

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Caraline Rickard

From: Wright, Jr. Luther <luther.wright@ogletree.com>
Sent: Wednesday, February 27, 2019 11:12 AM
To: Justin Gilbert
Cc: Caraline Rickard; Jhoselin Revolorio; Rachael Cook; Parker, Casey McCluskey
Subject: Re: Singh v. Vanderbilt

Justin,

Let me know of a good time to talk this afternoon. I would like to look at some deposition dates the last two weeks of March. I am checking with the deponents about dates those week. I would also like to push the deposition deadline to the end of the month and move summary judgment by a week. I also need a few more days to get the remaining discovery to you.

Luther Wright, Jr. , 615-687-2213(o).

Sent from my iPhone

On Feb 22, 2019, at 10:08 AM, Justin Gilbert <jgilbert@gilbertfirm.com> wrote:

Hi Luther,

We can certainly work with you on dates. The attorney client issue is likely something the client and Mr. Kinslow would also have to weigh in on. Of course, we are always wanting to discuss resolution. My cell is 731.616.8135 and I'm available this afternoon. Justin

<image002.png>

From: Wright, Jr. Luther <luther.wright@ogletree.com>
Sent: Thursday, February 21, 2019 5:34 PM
To: Justin Gilbert <jgilbert@gilbertfirm.com>; Caraline Rickard <crickard@gilbertfirm.com>; Jhoselin Revolorio <jrevolorio@gilbertfirm.com>
Cc: Rachael Cook <rcook@gilbertfirm.com>; Parker, Casey McCluskey <casey.parker@ogletreedeakins.com>
Subject: RE: Singh v. Vanderbilt

All,

Thanks for the e-mail. Would one of you be available for a quick call tomorrow? My schedule is horrendous during the next several weeks and I would like to propose some dates the last two weeks of March as possibilities for depositions. I obviously need to depose the Plaintiff and former counsel Tracey Kinslow (which is one of the issues I want to talk to you about briefly as it relates to the privilege issue and the limited waiver recognized in the Court's Order. I believe the communications between plaintiff and counsel relevant to the prior motion are discoverable and should be produced). I think we can do the depositions by agreement past March 15th if you are willing, or I can move to extend the deadline and perhaps extend the SJ deadlines by one week for filing and response and shorten the reply deadline.

I plan to have the discovery responses to you on or before the date specified. Would also like to discuss your thoughts on a resolution before depositions.

Luther Wright, Jr. | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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luther.wright@ogletree.com | www.ogletree.com | [Bio](#)

From: Rachael Cook <rcook@gilbertfirm.com>

Sent: Wednesday, February 20, 2019 1:14 PM

To: Wright, Jr. Luther <Luther.Wright@ogletreedeakins.com>; Parker, Casey McCluskey <casey.parker@ogletreedeakins.com>

Cc: Justin Gilbert <jgilbert@gilbertfirm.com>; Caraline Rickard <crickard@gilbertfirm.com>; Jhoselin Revolorio <jrevolorio@gilbertfirm.com>

Subject: Singh v. Vanderbilt

Dear Counsel,

Please find the attached correspondence from Mr. Gilbert regarding the above-referenced matter.

Thanks,

<image003.jpg>

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Caraline Rickard

From: Wright, Jr. Luther <luther.wright@ogletree.com>
Sent: Monday, March 18, 2019 7:42 PM
To: Justin Gilbert
Cc: Caraline Rickard
Subject: Re: Singh

Should have it to you by Friday. Will send you documents starting tomorrow.

Luther Wright, Jr. , 615-687-2213(o). Sent from my iPhone

> On Mar 18, 2019, at 7:39 PM, Justin Gilbert <jgilbert@gilbertfirm.com> wrote:

>

> Luther, I understand we still have not gotten your answers to our written discovery. We need to iron out the depositions but we really must get that discovery. Please advise. Thanks.

>

> Sent from my iPhone

>

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Caraline Rickard

From: Wright, Jr. Luther <luther.wright@ogletree.com>
Sent: Friday, March 22, 2019 3:36 PM
To: Caraline Rickard
Cc: Parker, Casey McCluskey; Justin Gilbert; Jhoselin Revolorio; Rachael Cook
Subject: RE: Singh v. Vanderbilt -- Depositions

Caraline,

Thanks for your e-mail. Our discovery responses rely almost exclusively on the documents that I have already provided, particularly the suspension, dismissal and confidential memorandum that provide the lion's share of detail sought in the Interrogatories. I will be sending you some additional documents today, and will follow up with the formal responses and other documents early next week.

It should be no problem with Singh's deposition time wise. If we start at 8:30 or 9:00 in Franklin, we should be done in plenty of time to have him catch his flight.

I will follow up with you on Monday.

Luther Wright, Jr. | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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luther.wright@ogletree.com | www.ogletree.com | [Bio](#)

From: Caraline Rickard <crickard@gilbertfirm.com>
Sent: Friday, March 22, 2019 2:47 PM
To: Wright, Jr. Luther <Luther.Wright@ogletreedekins.com>
Cc: Parker, Casey McCluskey <casey.parker@ogletreedekins.com>; Justin Gilbert <jgilbert@gilbertfirm.com>; Jhoselin Revolorio <jrevolorio@gilbertfirm.com>; Rachael Cook <rcook@gilbertfirm.com>
Subject: RE: Singh v. Vanderbilt -- Depositions

April 9th works. We would like to have the deposition at our Franklin office (address below in my signature). We would also like to start no later than 8:30 a.m. so that Dr. Singh has plenty of time to catch his flight back to New York that evening (he tells me the last flight of the night leaves at 6:30 p.m.). Let me know if that time and location works for you.

Do you still anticipate sending discovery responses today?

Thanks,



GILBERT | MCWHERTER
SCOTT | BOBBITT PLC

Caraline Rickard
Attorney

341 Cool Springs Boulevard, Suite 230
Franklin, Tennessee 37067 | 615.354.1144
crickard@gilbertfirm.com

Jackson | Nashville | Chattanooga | Memphis

From: Wright, Jr. Luther [<mailto:luther.wright@ogletree.com>]
Sent: Thursday, March 21, 2019 2:14 PM
To: Caraline Rickard
Cc: Parker, Casey McCluskey; Justin Gilbert; Jhoselin Revolorio; Rachael Cook
Subject: Re: Singh v. Vanderbilt -- Depositions

April 9th works better for our client as there is now a conflict on April 8th. Let me know if the 9th works.

Luther Wright, Jr. , 615-687-2213(o).

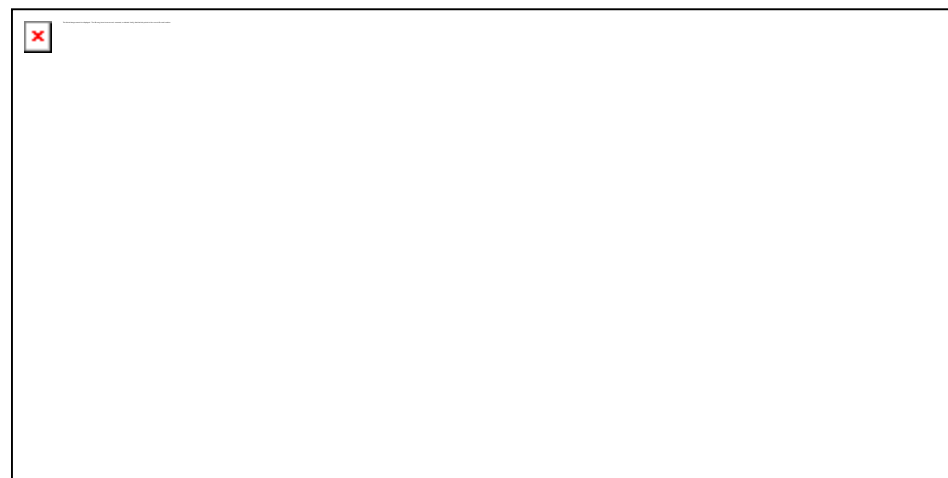
Sent from my iPhone

On Mar 19, 2019, at 4:17 PM, Caraline Rickard <crickard@gilbertfirm.com> wrote:

I spoke to Dr. Singh, and of the April 8-9 days you proposed for his deposition, he would prefer April 8. He is also now available the week of April 1 if we would like to get everything done that week. Please let me know.

Thanks,

Caraline



From: Wright, Jr. Luther [<mailto:luther.wright@ogletree.com>]
Sent: Friday, March 15, 2019 2:30 PM
To: Caraline Rickard
Cc: Parker, Casey McCluskey; Justin Gilbert; Jhoselin Revolorio; Rachael Cook
Subject: Re: Singh v. Vanderbilt -- Depositions

We can do Dr. Brady on April 3rd and the other two doctors on April 1st (I have a conflict on the 2nd). We need to confirm times and need to do the depositions at VUMC. Would also like to do Tracey Kinslow's deposition on the 3rd if we can swing it.

Let me know if that works as I need to get specific times set for them.

Luther Wright, Jr. , 615-687-2213(o).

Sent from my iPhone

On Mar 11, 2019, at 2:25 PM, Caraline Rickard <crickard@gilbertfirm.com> wrote:

Hi Luther,

Justin asked me to follow up with you about deposition dates. Can we confirm April 1-3 for the doctors and April 8-9 for Plaintiff?

Thanks,

<image001.jpg>

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Caraline Rickard

From: Wright, Jr. Luther <luther.wright@ogletree.com>
Sent: Friday, March 22, 2019 3:44 PM
To: Caraline Rickard
Cc: Justin Gilbert; Parker, Casey McCluskey; Jhoselin Revolorio; Rachael Cook
Subject: FW: Singh v. VUMC
Attachments: Singh Release and Waiver - VUMC 0153-0154.pdf; Singh--February 25 2016 Dismissal Letter - VUMC 0140-0152.pdf; Singh--February 2 2016 Supplement EAD Report - VUMC 0137-0139.pdf; Singh--February 4 2016 EAD Letter - VUMC 0136.pdf; Singh--Redacted Febraury 25 2016 Dismissal Letter - VUMC 0158-0170.pdf; Singh--August 3 2016--Supplemental Confidential Memornadum - VUMC 0155-0157.pdf

Here are additional documents referenced in my earlier e-mail.

Luther Wright, Jr. | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
SunTrust Plaza, 401 Commerce Street, Suite 1200 | Nashville, TN 37219-2446 | Telephone: 615-687-2213 | Fax: 615-254-1908 luther.wright@ogletree.com | www.ogletree.com | Bio

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Caraline Rickard

From: Justin Gilbert
Sent: Monday, March 25, 2019 4:55 PM
To: Wright, Jr. Luther
Cc: Caraline Rickard; Parker, Casey McCluskey; Jhoselin Revolorio; Rachael Cook
Subject: Re: Singh v. VUMC

Luther,

Please send us the interrogatory and RFP answers so we can put all this together instead of us figuring out what goes with what. Thx. Justin

Sent from my iPhone

> On Mar 22, 2019, at 3:44 PM, Wright, Jr. Luther <luther.wright@ogletree.com> wrote:

>

> Here are additional documents referenced in my earlier e-mail.

>

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>

> <Singh Release and Waiver - VUMC 0153-0154.pdf> <Singh--February 25

> 2016 Dismissal Letter - VUMC 0140-0152.pdf> <Singh--February 2 2016

> Supplement EAD Report - VUMC 0137-0139.pdf> <Singh--February 4 2016

> EAD Letter - VUMC 0136.pdf> <Singh--Redacted Febraury 25 2016

> Dismissal Letter - VUMC 0158-0170.pdf> <Singh--August 3

> 2016--Supplemental Confidential Memornadum - VUMC 0155-0157.pdf>